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Inc.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	:	Civil Action No.: 1:15-cv-00907-
MEDIDATA SOLUTIONS, INC.	:	ALC
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
FEDERAL INSURANCE COMPANY,	:	
	:	
Defendant.	:	
-----	:	

JOINT EXHIBIT STIPULATION

Plaintiff Medidata Solutions, Inc. (“Medidata”), and Defendant Federal Insurance Company (“Federal,” and, collectively with Medidata, the “Parties”) hereby jointly submit the following exhibits in support of the Parties’ Cross-Motions for Summary Judgment in the above-referenced action, and stipulate that the exhibits are true and correct copies of documents produced in this action. The parties stipulate to the authenticity and foundation for these documents only. The parties reserve all other objections to the admission of these documents.

1. Attached hereto as Exhibit 1 is a true and correct copy of Federal Executive Protection Portfolio Policy No. 8212-1392, issued by Federal to Medidata for the policy period June 25, 2014 to June 25, 2015, produced at FIC001322-406.

2. Attached hereto as Exhibit 2 is a true and correct copy of a screenshot of an email purportedly from “[REDACTED]” to “[REDACTED]” and “mmeyer” sent on September 16, 2014, at 11:12 AM, produced at MED_0000709, which was marked as Deposition Exhibit 14. A color version of the email, produced at MED_0000816, is also attached as Exhibit 2.

3. Attached hereto as Exhibit 3 is a true and correct copy of an email purportedly from “[REDACTED]” to “[REDACTED]” and “mmeyer@consultant.com” sent on September 16, 2014, at 11:12 AM, produced at MED_0002113.

4. Attached hereto as Exhibit 4 is a true and correct copy of an email from “[REDACTED]” to an individual purporting to be [REDACTED], carbon copied to “mmeyer@consultant.com,” sent on September 16, 2014, at 11:22 AM, produced at MED_0002112.

5. Attached hereto as Exhibit 5 is a true and correct copy of an email from “[REDACTED]” to “[REDACTED]” to “Michael Meyer,” sent on September 16, 2014, at 3:01 PM, produced at MED_0002096-99.

6. Attached hereto as Exhibit 6 is a true and correct copy of a screenshot of an email purportedly from “[REDACTED]” to “[REDACTED]” and “[REDACTED]” sent on September 16, 2014, at 3:32 PM, produced at MED_0000711, which was marked as Deposition

Exhibit 3. A color version of the email, produced at MED_0001025, is also attached as Exhibit 6.

7. Attached hereto as Exhibit 7 is a true and correct copy of an email purportedly from “[REDACTED]” to “[REDACTED]” and “[REDACTED]” sent on September 16, 2014, at 3:32 PM, produced at MED_0002095.

8. Attached hereto as Exhibit 8 is a true and correct copy of a screenshot of an email purportedly from “[REDACTED]” to “[REDACTED]” and “mmeyer” sent on September 16, 2014, at 3:52 PM, produced at MED_0001045, which was marked as Deposition Exhibit 13.

9. Attached hereto as Exhibit 9 is a true and correct copy of an email purportedly from “[REDACTED]” to “[REDACTED]” and “mmeyer” sent on September 16, 2014, at 3:52 PM, produced at MED_0002089.

10. Attached hereto as Exhibit 10 is a true and correct copy of the J.P. Morgan “Payment Report – Detail SD” created on September 23, 2014, at 1:31 PM, referencing a wire transfer that occurred on September 16, 2014, produced at MED_0000020-21, the first page of which was marked as Deposition Exhibit 16 and the second page of which was marked as Deposition Exhibit 6.

11. Attached hereto as Exhibit 11 is a true and correct copy of a “File Note” from Federal’s “Workstation” system, created by Laura-Ann Simmonds on September 26, 2014, at 10:41 AM, produced at FIC000733-34.

12. Attached hereto as Exhibit 12 is a true and correct copy of a “File Note” from Federal’s “Workstation” system, created by Michael Maillet on December 29, 2014, at 9:18 AM, produced at FIC000044-50, which was marked as Deposition Exhibit 20.

13. Attached hereto as Exhibit 13 is a true and correct copy of a “File Note” from Federal’s “Workstation” system, created by Michael Maillet on October 2, 2014, at 6:08 PM, produced at FIC000712-15, which was marked as Deposition Exhibit 27.

14. Attached hereto as Exhibit 14 is a true and correct copy of a letter from Robin L. Cohen to Michael A. Maillet, dated January 13, 2015, produced at FIC000038-41.

15. Attached hereto as Exhibit 15 is a true and correct copy of an email and attachment from Michael Maillet to Robin Cohen sent on January 30, 2015, at 5:44 PM, produced at FIC000003-7, which was marked as Deposition Exhibit 30.

16. Attached hereto as Exhibit 16 is a true and correct copy of an email sent by Glenn Watt on July 9, 2014, at 8:41 AM, produced at MED_0000787-88.

17. Attached hereto as Exhibit 17 is a true and correct copy of emails sent by Glenn Watt, Glen de Vries, and Tarek Sherif on October 6, 2014, produced at MED_0000811-13.

18. Attached hereto as Exhibit 18 is a true and correct copy of Medidata’s Objections and Responses to Federal’s Requests for Admission, dated May 29, 2015.

19. Attached hereto as Exhibit 19 is a true and correct copy of excerpts from the transcript, including the index, of the Deposition of [REDACTED], taken on June 24, 2015.

20. Attached hereto as Exhibit 20 is a true and correct copy of excerpts from the transcript, including the index, of the Deposition of [REDACTED], taken on June 25, 2015.

21. Attached hereto as Exhibit 21 is a true and correct copy of excerpts from the transcript, including the index, of the Deposition of [REDACTED], taken on June 25, 2015.

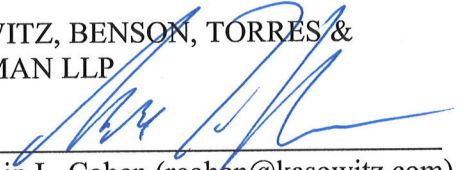
22. Attached hereto as Exhibit 22 is a true and correct copy of excerpts from the transcript, including the index, of the Deposition of Christopher Arehart, taken on July 9, 2015.

23. Attached hereto as Exhibit 23 is a true and correct copy of excerpts from the transcript, including the index, of the Deposition of Michael Maillet, taken on July 9, 2015.

Dated: New York, New York
August 13, 2015

For Plaintiff Medidata Solutions, Inc.

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